

As asserted in the amendment responding to the Final Office Action in the parent case, there would be no motivation to combine Kurabayashi or Takahashi with  
5 Zhu or EP 735120. There would furthermore be no motivation to combine Kurabayashi or Takahashi as well as Watanabe with Zhu and EP 735120 further in view of Yatake. Kurabayashi, Takahashi, Watanabe and Yatake all disclose cationic components of reaction solutions, often called fixer solutions, used to enhance the quality of printed inkjet ink images printed over the reaction solutions.  
10 In contrast, the anionic binder in the inkjet ink in Zhu and EP 735120 acts to help bind the anionic colorant of the ink to the media substrate, which is preferably a non-porous substrate such as plastic or glass. The presence of a cationic underprinting reaction solution in the systems of either Zhu or EP 735120 would significantly hinder the ink from binding to the substrate because the anionic binder  
15 would bind to the cations in the reaction solution instead.

Shirley Lee, primary inventor in this application, has executed a declaration, attached herein, in which she describes her longstanding familiarity with inkjet inks and their interaction with underprinting fixer fluids. She states her knowledge that  
20 cationic underprinting fluid added to the system of Zhu or EPO 735120 would interfere with the film forming ability of the anionic styrene-copolymer in the ink, so that no scratch resistance or rub resistance would be achieved and binding of the ink to the substrate would be significantly affected.

25 This evidence of the negative effect of cationic underprinting fixer fluids on the system of either Zhu or EPO 735120 proves a lack of motivation or suggestion to combine either Kurabayashi, Takahashi, Watanabe or Yatake with Zhu or EPO 735120. All four of Kurabayashi, Takahashi, Watanabe and Yatake teach cationic underprinting fixer fluid used in combination with inkjet ink. Zhu and EPO 735120  
30 teach anionic binders in inkjet ink used for the purpose of binding the ink to the substrate. Applicant has given evidence that one skilled in the art would know that the system of Zhu and EPO 735120 would not be able to achieve its purpose

when combined into a system of Kurabayashi, Takahashi, Watanabe or Yatake, taken together or individually.

One skilled in the art, knowing these facts, would not find any suggestion, teaching or motivation from the references to combine these references together. Furthermore, one skilled in the art would not find in these references the discovery of the present applicants to add an inkjet ink having an anionic binder to an underprinting fluid having both polyvalent metal cations and polymeric cations, achieving the unexpected result of a marked improvement in color quality and stability of the inkjet inks on the substrate through the binding of the anionic binder to the cations.

In view of the above arguments and declaration, applicants respectfully assert that a prima facie case of non-obviousness has not been made because of the lack of motivation in the references to combine Zhu and EPO 735120 with the other references. Accordingly, applicants request the Examiner's reconsideration and withdrawal of the presently pending § 103 rejections. Applicants assert that the presently claimed invention should be allowed.

A prompt and positive response is respectfully requested.

Respectfully Submitted,

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